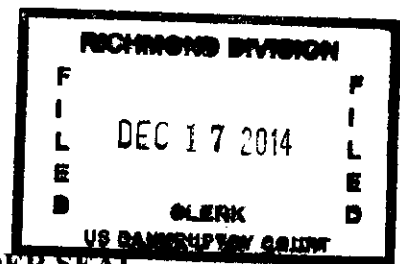UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Donald Wayne Andrews, Jr.   Case No.: 14-36384-KRH

Chapter: 7

RICHMOND DIVISION
F   F
I   I
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CLERK
US BANKRUPTCY COURT

MOTION TO FILE DOCUMENTS UNDER SEAL

COMES NOW, Movant, Donald Wayne Andrews Jr., and moves this honorable Court for entry of an Order authorizing Movant to file under seal the identity of his employer and respectfully represents:

1. Movant filed a voluntary petition on November 28, 2014, under Chapter 7 of the Bankruptcy Code.

2. Movant seeks to file his employer's identity under seal because he reasonably believes the disclosure of this information will result in harassment from Movant's Creditor, Dana Bernhardt.

3. In January 2014, Ms. Bernhardt, through her attorneys, accused Mr. Andrews of Criminal Contempt for non-payment of attorney fees. Movant was un-employed at the time and the court appointed an attorney, Micheal Hockaday, to assist in his defense.

4. Movant's Attorney was able to have the criminal charge dismissed after 10 months, but warned Movant that if Ms. Bernhardt was able to ascertain the identity of Movant's employer, she could again file the criminal charge.

5. During Movant's criminal trial, he evoked his fifth amendment right to avoid giving self-incriminating testimony, and disclosing the identity of his employer would negate Movant's ability to avoid these frivolous prosecutions in the future.

6. In addition, it is Movant's reasonable belief that Ms. Bernhardt would contact his employer and disclose the fact that Movant has been a criminal defendant for the past 10 months. Though Movant was not convicted of any crime and the criminal charge was dismissed, it is likely Movant's employer will not see the criminal charge as frivolous.

7. Movant is prepared, with the approval of this honorable Court, to provide all financial documentation that the U.S. Trustee may request, with the simple redaction of the identity of his employer. Movant has included an example of his redacted pay stub as Exhibit A, as clarification of this intention.

8. Movant has provide accurate financial information on his petition, and believes that the redaction of the identity of his employer would in no way hinder the U.S. Trustee's ability to make just and accurate decisions in protecting creditors' interest.

9. Movant reasonably believes that his employer's identity is irrelevant to his Petition and will be used by his creditor for an improper end. To this, the redaction and omission of his employer's identity does not violate the legislative intent of Section 107.

10. Mr. Andrews enjoys his employment very much and the loss of his employment would greatly impair his ability to support himself and his family, and violate the legislative intent of the bankruptcy code in preserving the viability of the debtor.

11. To be extremely clear, Movant is not attempting to hide anything from this honorable Court, or any other court. Movant's hopes are simply to avoid providing information which will later be improperly used to damage him, and is irrelevant to the Bankruptcy proceeding. The disclosure of this information would become a vehicle for improper purposes.

12. Movant is prepared to submit a formal brief on this matter at the request of the Court.

13. Due to the sensitive nature of this Motion, a copy has not been filed through CM/ECF, nor sent to the U.S. Trustee.

WHEREFORE, Movant prays this honorable Court will grant him the following relief:

1. Allow Movant to file the identity of his employer under seal,

2. Allow Movant to redact the name of this employer from any documents further requested by this honorable Court or the U.S. Trustee.

3. Movant further request this honorable Court order the destruction of any sealed documents upon discharge or disposal of his bankruptcy case.
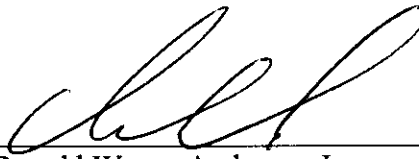
Date: 12/15/2014

Donald Wayne Andrews, Jr.
2408 Burgage Lane
S. Prince George, VA 23805
(757) 701-6904

Exhibit A

Payslip   Page 1 of 2

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Payslip

Employee Name	**Andrews, Jr, Donald**	Employee Number	███████
Organization Email Address	███████	Business Group	███████

Choose a Payslip   05-DEC-2014 - 156259 - Check 1 | Go

Employee	**Donald W. Andrews, Jr**	Employer name	███████
Job Title	███████	Organization	███████
Employee Number	███████	Pay Basis	**Salaried**
Latest Hire Date	**05-Aug-2014**	Frequency	**Week**
Original Hire Date	**05-Aug-2014**	Shift	
Location	███████	Grade	███████
Position	███████	Employer Address	███████
Payroll	**COR BI-weekly**		
Employee Address	**2408 Burgage Lane**		
	Petersburg		
	VA		
	23805		

Pay Period and Salary

Pay Period	Payment Date	Pay Begin Date	Pay End Date	Pay Rate	Annual Salary
Bi-Week	05-Dec-2014	15-Nov-2014	28-Nov-2014	39,780.00	39,780.00

Summary

Current or YTD ▲	Gross	Pre-Tax	Taxes	Deductions	Net Pay
Current	1,530.00	0.00	117.04	184.59	1,228.37
YTD	12,862.80	0.00	983.17	1,570.88	10,297.95

Hours and Earnings

Description	Start Date	End Date	Current Hours	Current Amount	YTD Hours	YTD Amount
Holiday			16.00	306.00	24.00	459.00
Sick Time				0.00	8.00	153.00
Vacation Time			8.00	153.00	16.00	306.00
Salary Earning			56.00	1,071.00	624.00	11,934.00
GTL Insurance				0.00		10.80

Rate Details

Pre-Tax Deductions

Description	Current	YTD
No results found.		

Taxes

Description	Current	YTD
Social Security	94.86	796.82
Medicare	22.18	186.35

After-Tax Deductions

Accruals

Description	Current	YTD	Description	Current	Balance
Child Support 1	184.59	1,476.72	Vacation	3.70	7.08
Basic Life Ins	0.00	94.16	FMLA	0.00	480.00
			Sick	3.70	23.08

Tax Withholding Information

Type	Marital Status	Exemptions	Secondary Exemptions	Additional Amount	Override Amount	Override Percentage
Federal	Exempt	0		0.00	0.00	0
Virginia	Exempt	0	0	0.00	0.00	0

Net Pay Distribution

Check/Deposit Number	Bank Name	Account Type	Account Number	Amount
53043555	wells fargo	C	XXXXXX6093	1,228.37

Third Party Payment Distribution

Check/Deposit Number	Bank Name	Account Type	Account Number	Amount
53043555	SunTrust Bank	C	XXXXX1924	184.59

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